

August 16th, 2022

Submitted via FOIAonline

Re: Freedom of Information Act Request

To Whom It May Concern:

Pursuant to the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552 et seq., Conservation Law Foundation (“CLF”) hereby requests all records as described below pertaining to reports submitted online to the Environmental Protection Agency via its “Report Environmental Violations” website at <https://echo.epa.gov/report-environmental-violations> related to motor vehicle idling in the municipalities of Holyoke, MA and Worcester, MA:

All reports of environmental violations submitted online to the “Report Environmental Violations” website at <https://echo.epa.gov/report-environmental-violations> that were submitted with all of the following criteria:

1. Basic Violation Information
 - a. Suspected Violation City: “Holyoke” OR “Worcester”
 - b. Suspected Violation State: “Massachusetts”
2. Violation Characterization
 - a. Date of Incident: from 01/01/2017 to present
 - b. Violation Method: “Release”
 - c. Affected Subjects: “Air”
 - d. Violation Description: any reference to “idling,” “idle,” “school bus,” “Durham,” “Durham School Services,” and/or “diesel”

We request records related to the above reports as follows:

- All information entered in the Report form;
- The full text of the “Violation Description” field;
- Any and all reports, records, correspondence, and notes associated with EPA’s processing of the report;
- Any and all reports, records, correspondence, and notes associated with actions or decisions made by EPA in response to the report.



Please provide the requested records in electronic format if possible. To the extent you believe any requested record is exempt from disclosure, please provide a log identifying which documents you claim are exempt, specify the exemption or privilege that you assert is applicable, and explain why you believe such exemption or privilege is applicable.

CLF requests that any fees incurred in conjunction with this request be waived, as disclosure of the requested records is in the public interest because it is likely to contribute significantly to public understanding of the operations or activities of the government and is not primarily in the commercial interest of the requester. 5 U.S.C. § 552(a)(4)(A)(iii); 40 C.F.R. § 2.107(l); Mass. Gen. Laws Ann. ch. 66, § 10(d)(v) (West). CLF is a 501(c)(3) organization and is seeking this information to inform CLF members and the public, including nearby residents, about the current state of environmental permitting and compliance at the facilities listed above.

Communications is an integral part of CLF's advocacy. We have a professional communications team that develops multi-media strategic communications plans for our initiatives and campaigns designed to deliver our message on multiple platforms to reach and engage diverse audiences. Communications tactics may include traditional media outreach, opinion pieces, blogs, features, and the creation and distribution of visual content to build a strong narrative, and raise public awareness. We also disseminate environmental news and analysis by our staff of experts to CLF members throughout New England via our website and email communications. In 2020 our website had 358,214 visits. In addition, as of February 2021, our email list is approximately 38,000 people, our Facebook audience is 20,943, on Twitter, CLF has 8,822 followers, on LinkedIn, we can reach 2,210 followers, and on Instagram, we have 1,366 followers. In 2020, CLF was quoted in the media 3,277 times in outlets including The Boston Globe, WBUR, Our Daily Planet, Chelsea Record, and many others.

In the event that our request for a fee waiver is denied, we request that the total cost be minimized by providing the information in electronic format. Also, if fees are assessed, please provide in advance a written, itemized, good faith estimate of such fees. *Id.* at 32.07(2)(b).

I appreciate your prompt response. Please do not hesitate to contact me at (216) 401-2513 or ehsi@clf.org if you have any questions. Thank you for your assistance with this request.

Sincerely,
Ethan Hsi
Paralegal, Clean Air and Water
Conservation Law Foundation